



August 16, 2019

Mr. McKenzie Mallary
Remedial Project Manager
U.S. EPA
61 Forsyth Street SW
Atlanta, GA 30303-3104

Mr. Joel P. Padgett, P.G., Geologist/Hydrologist III
Federal Remediation Section
Division of Site Assessment and Remediation
Bureau of Land and Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, SC 29201

**RE: Request to Remove Well MM-14C from Monitoring Program
Dominion Energy South Carolina, Inc.
Calhoun Park Area Site
Charleston, South Carolina**

Dear Mr. Mallary and Mr. Padgett:

On behalf of Dominion Energy South Carolina, Inc. (DESC), this request is submitted for approval to remove well MM-14C from the annual intermediate groundwater monitoring program at the Calhoun Park Area (CPA) site in Charleston, South Carolina.

A recommendation to remove well MM-14C was included in the Intermediate Groundwater Monitoring Results Report for the December 2018 event submitted on May 31, 2019. In the SCDHEC letter dated June 20, 2019 that provided comments on the report, the Division of Site Assessment, Remediation and Revitalization did not concur with removal of MM-14C from the program without submittal of additional data. The letter stated the Division will reconsider the request upon review of additional information. The additional information is provided within this submittal.

For reference, the location of well MM-14C is identified on Figure 1 in Attachment A. Analytical data as received from the laboratory is summarized in Table 1 in Attachment A for the last six rounds of monitoring (March 2015 through December 2018). As noted in the table, the data reported are based on the laboratory method detection limit (MDL) rather than the reporting limit (RL). For reference, copies of the results for MM-14C samples from the laboratory reports are provided as Attachment B.

The six sets of data in Table 1 for the eight constituents in the monitoring program provide a total of 48 analytical results. The clean-up goals for each constituent are also provided in Table 1. Constituents were not detected at the laboratory MDL for 31 of the 48 results. Estimated ("J") values between the MDL and RL, with each estimated value below the clean-up goal, were reported for 13 results summarized in Table 1. Of the four detections above the RL, three were at or below the clean-up goal and one result (benzene at 9 ug/L in the June 2017 sample) was slightly above the clean-up goal of 5 ug/L.

Based upon this more detailed review of the previous analytical results provided by the laboratory as reported using the MDL, the recommendation from the recently submitted report to remove MM-14C from the annual monitoring program remains valid.



Should you have any questions or require any additional information, please contact me at (412) 829-9650. We appreciate your assistance in this matter.

Sincerely,
Apex Companies, LLC

A handwritten signature in blue ink, appearing to read "William J. Zeli".

William J. Zeli, P.E.
Environmental Program Manager

cc: P. Biery, T. Effinger, R. Contrael – DESC

Attachments

- A Figures and Tables
- B MM-14C Analytical Results as Reported by Laboratory

ATTACHMENT A
FIGURES AND TABLES

- Figure 1 Intermediate Groundwater Monitoring Locations
- Table 1 Intermediate Groundwater Monitoring Program, Middle Intermediate Well MM-14C, Analytical Results as Reported by Laboratory – March 2015 through December 2018

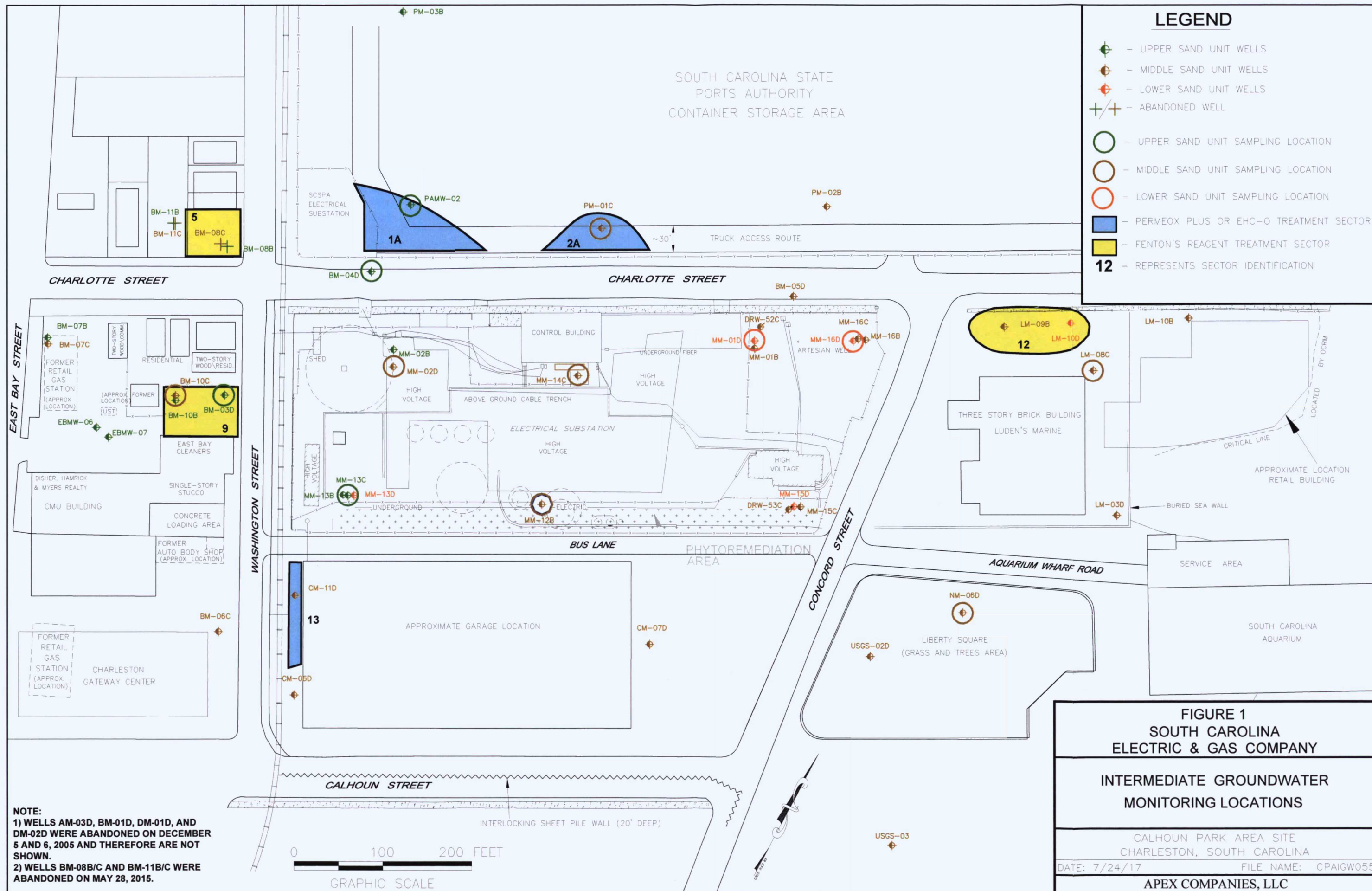


TABLE 1

**INTERMEDIATE GROUNDWATER MONITORING PROGRAM
MIDDLE INTERMEDIATE WELL MM-14C
ANALYTICAL RESULTS AS REPORTED BY LABORATORY - MARCH 2015 THROUGH DECEMBER 2018**

DESC Calhoun Park Area Site
Charleston, South Carolina

Constituent	Units	Cleanup Goal (µg/L)	3/17/2015	12/18/2015	9/26/2016	6/8/2017	3/21/2018	12/12/2018
<u>Volatiles</u>								
Benzene	µg/L	5	0.21 U	2.8	1.4 J	9.0	3.6 J	3.3 J
Ethylbenzene	µg/L	700	0.27 U	1.0 U	0.27 U	0.37 U	0.37 U	0.30 J
Toluene	µg/L	1,000	0.65 J	1.0 U	0.21 U	0.29 U	0.29 U	0.23 U
Xylenes, Total	µg/L	10,000	0.64 J	2.0 U	0.39 U	0.56 J	0.67 J	0.76 J
<u>Semi-Volatiles</u>								
2,4-Dimethylphenol	µg/L	700	0.84 U	5.1 U	0.84 U	0.81 U	0.83 U	0.06 U
Benzo(a)pyrene	µg/L	0.2	0.057 U	0.2	0.057 U	0.055 U	0.056 U	0.083 U
Carbazole ⁽¹⁾	µg/L	5	0.12 U	5.1 U	0.12 U	0.11 U	0.11 U	0.053 U
Naphthalene	µg/L	1,500	0.073 U	0.41	0.40 J	5.1 J	0.26 J	0.32 J

Notes:

U - Indicates the constituent was not detected at the laboratory method detection limit (MDL), or the reporting limit (RL) used for the December 2015 analyses.

J - Indicates an estimated value reported between the laboratory MDL and RL.

ATTACHMENT B

LABORATORY ANALYTICAL DATA FOR MM-14C SAMPLES

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Client Sample ID:	MM-14C	Date Sampled:	03/17/15
Lab Sample ID:	LA4840-7	Date Received:	03/19/15
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8260B		
Project:	Intermediate GWS- SCE&G Calhoun Park Area Site		

Run #	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	1H009577.D	1	03/24/15	SV	n/a	n/a	V1H147
Run #2							

Run #	Purge Volume
Run #1	5.0 ml
Run #2	

Purgeable Aromatics

CAS No.	Compound	Result	RL	MDL	Units	Q
71-43-2	Benzene	0.00021 U	0.0010	0.00021	mg/l	
108-88-3	Toluene	0.00065	0.0010	0.00021	mg/l	J
100-41-4	Ethylbenzene	0.00027 U	0.0010	0.00027	mg/l	
1330-20-7	Xylene (total)	0.00064	0.0010	0.00039	mg/l	J

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
17060-07-0	1,2-Dichloroethane-D4	94%		84-124%
2037-26-5	Toluene-D8	99%		83-115%
460-00-4	4-Bromofluorobenzene	98%		89-111%

U = Not detected MDL = Method Detection Limit
 RL = Reporting Limit
 E = Indicates value exceeds calibration range

J = Indicates an estimated value
 B = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

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Client Sample ID:	MM-14C	Date Sampled:	03/17/15
Lab Sample ID:	LA4840-7	Date Received:	03/19/15
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8270D SW846 3510C		
Project:	Intermediate GWS- SCE&G Calhoun Park Area Site		

Run #	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	C0003202.D	1	03/20/15	IK	03/20/15	OP805	EC337
Run #2							

Run #	Initial Volume	Final Volume
Run #1	970 ml	1.0 ml
Run #2		

ABN Special List

CAS No.	Compound	Result	RL	MDL	Units	Q
105-67-9	2,4-Dimethylphenol	0.00084 U	0.0052	0.00084	mg/l	
50-32-8	Benzo(a)pyrene	0.000057 U	0.00021	0.000057	mg/l	
86-74-8	Carbazole	0.00012 U	0.0052	0.00012	mg/l	
91-20-3	Naphthalene	0.000073 U	0.00021	0.000073	mg/l	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
367-12-4	2-Fluorophenol	49%		36-126%
4165-62-2	Phenol-d5	32%		9-73%
118-79-6	2,4,6-Tribromophenol	94%		34-153%
4165-60-0	Nitrobenzene-d5	94%		35-166%
321-60-8	2-Fluorobiphenyl	89%		36-126%
1718-51-0	Terphenyl-d14	92%		33-154%

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Client Sample ID:	MM-14C	Date Sampled:	12/18/15
Lab Sample ID:	LA15342-5	Date Received:	12/19/15
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8260B		
Project:	Intermediate GWS- SCE&G Calhoun Park Area Site		

Run #	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	2Q0023672.D	1	12/25/15	NN	n/a	n/a	V2Q696
Run #2							

Run #	Purge Volume
Run #1	5.0 ml
Run #2	

Purgeable Aromatics

CAS No.	Compound	Result	RL	Units	Q
71-43-2	Benzene	0.0028	0.0010	mg/l	
108-88-3	Toluene	ND	0.0010	mg/l	
100-41-4	Ethylbenzene	ND	0.0010	mg/l	
1330-20-7	Xylene (total)	ND	0.0020	mg/l	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
17060-07-0	1,2-Dichloroethane-D4	117%		84-124%
2037-26-5	Toluene-D8	101%		83-115%
460-00-4	4-Bromofluorobenzene	95%		89-111%

ND = Not detected
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Client Sample ID:	MM-14C	Date Sampled:	12/18/15
Lab Sample ID:	LA15342-5	Date Received:	12/19/15
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8270D SW846 3510C		
Project:	Intermediate GWS- SCE&G Calhoun Park Area Site		

Run #	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	C0012532.D	1	12/24/15	IK	12/23/15	OP3741	EC640
Run #2							

Run #	Initial Volume	Final Volume
Run #1	980 ml	1.0 ml
Run #2		

ABN Special List

CAS No.	Compound	Result	RL	Units	Q
105-67-9	2,4-Dimethylphenol	ND	0.0051	mg/l	
50-32-8	Benzo(a)pyrene	0.00020	0.00020	mg/l	
86-74-8	Carbazole	ND	0.0051	mg/l	
91-20-3	Naphthalene	0.00041	0.00020	mg/l	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
367-12-4	2-Fluorophenol	25% ^a		36-126%
4165-62-2	Phenol-d5	24%		9-73%
118-79-6	2,4,6-Tribromophenol	41%		34-153%
4165-60-0	Nitrobenzene-d5	88%		35-166%
321-60-8	2-Fluorobiphenyl	91%		36-126%
1718-51-0	Terphenyl-d14	103%		33-154%

(a) Outside of control limits. However, this procedure allows for one surrogate exceedance for acid and base fraction.

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Client Sample ID:	MM-14C	Date Sampled:	09/26/16
Lab Sample ID:	LA25863-7	Date Received:	09/28/16
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8260B		
Project:	Intermediate GWS- SCE&G Calhoun Park Area Site		

Run #	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	2J0024589.D	1	10/03/16	CP	n/a	n/a	V2J762
Run #2							

Run #	Purge Volume
Run #1	5.0 ml
Run #2	

Purgeable Aromatics

CAS No.	Compound	Result	RL	MDL	Units	Q
71-43-2	Benzene	0.0014	0.0050	0.00021	mg/l	J
108-88-3	Toluene	ND	0.0050	0.00021	mg/l	
100-41-4	Ethylbenzene	ND	0.0050	0.00027	mg/l	
1330-20-7	Xylene (total)	ND	0.0050	0.00039	mg/l	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
17060-07-0	1,2-Dichloroethane-D4	100%		84-124%
2037-26-5	Toluene-D8	99%		83-115%
460-00-4	4-Bromofluorobenzene	95%		89-111%

ND = Not detected MDL = Method Detection Limit
 RL = Reporting Limit
 E = Indicates value exceeds calibration range

J = Indicates an estimated value
 B = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

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Client Sample ID:	MM-14C	Date Sampled:	09/26/16
Lab Sample ID:	LA25863-7	Date Received:	09/28/16
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8270D SW846 3510C		
Project:	Intermediate GWS- SCE&G Calhoun Park Area Site		

	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	F0022083.D	1	09/30/16	IK	09/29/16	OP6416	EF702
Run #2							

	Initial Volume	Final Volume
Run #1	970 ml	1.0 ml
Run #2		

ABN Special List

CAS No.	Compound	Result	RL	MDL	Units	Q
105-67-9	2,4-Dimethylphenol	ND	0.010	0.00084	mg/l	
50-32-8	Benzo(a)pyrene	ND	0.010	0.000057	mg/l	
86-74-8	Carbazole	ND	0.010	0.00012	mg/l	
91-20-3	Naphthalene	0.00040	0.010	0.000073	mg/l	J

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
367-12-4	2-Fluorophenol	54%		23-85%
4165-62-2	Phenol-d5	38%		10-69%
118-79-6	2,4,6-Tribromophenol	99%		48-138%
4165-60-0	Nitrobenzene-d5	78%		51-128%
321-60-8	2-Fluorobiphenyl	79%		55-122%
1718-51-0	Terphenyl-d14	76%		43-138%

ND = Not detected MDL = Method Detection Limit

RL = Reporting Limit

E = Indicates value exceeds calibration range

J = Indicates an estimated value

B = Indicates analyte found in associated method blank

N = Indicates presumptive evidence of a compound

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Client Sample ID:	MM-14C	Date Sampled:	06/08/17
Lab Sample ID:	LA34212-3	Date Received:	06/09/17
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8260B		
Project:	Intermediate GWS- SCE&G Calhoun Park Area Site		

Run #	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	2X0022556.D	1	06/14/17 18:03	PJ	n/a	n/a	V2X258
Run #2							

Run #	Purge Volume
Run #1	5.0 ml
Run #2	

Purgeable Aromatics

CAS No.	Compound	Result	RL	MDL	Units	Q
71-43-2	Benzene	9.0	5.0	0.21	ug/l	
108-88-3	Toluene	0.29 U	5.0	0.29	ug/l	
100-41-4	Ethylbenzene	0.37 U	5.0	0.37	ug/l	
1330-20-7	Xylene (total)	0.56	5.0	0.39	ug/l	J

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
17060-07-0	1,2-Dichloroethane-D4	101%		84-124%
2037-26-5	Toluene-D8	98%		83-115%
460-00-4	4-Bromofluorobenzene	100%		89-111%

U = Not detected MDL = Method Detection Limit

RL = Reporting Limit

E = Indicates value exceeds calibration range

J = Indicates an estimated value

B = Indicates analyte found in associated method blank

N = Indicates presumptive evidence of a compound

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Client Sample ID:	MM-14C	Date Sampled:	06/08/17
Lab Sample ID:	LA34212-3	Date Received:	06/09/17
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8270D SW846 3510C		
Project:	Intermediate GWS- SCE&G Calhoun Park Area Site		

Run #	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	F0030814A.D	1	06/14/17 10:52	IK	06/13/17 09:00	OP8623	EF1028
Run #2							

Run #	Initial Volume	Final Volume
Run #1	1000 ml	1.0 ml
Run #2		

ABN Special List

CAS No.	Compound	Result	RL	MDL	Units	Q
105-67-9	2,4-Dimethylphenol	0.81 U	10	0.81	ug/l	
50-32-8	Benzo(a)pyrene	0.055 U	10	0.055	ug/l	
86-74-8	Carbazole	0.11 U	10	0.11	ug/l	
91-20-3	Naphthalene	5.1	10	0.071	ug/l	J

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
367-12-4	2-Fluorophenol	49%		23-85%
4165-62-2	Phenol-d5	38%		10-69%
118-79-6	2,4,6-Tribromophenol	84%		48-138%
4165-60-0	Nitrobenzene-d5	75%		51-128%
321-60-8	2-Fluorobiphenyl	80%		55-122%
1718-51-0	Terphenyl-d14	76%		43-138%

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J = Indicates an estimated value

B = Indicates analyte found in associated method blank

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Client Sample ID:	MM-14C	Date Sampled:	03/21/18
Lab Sample ID:	LA42536-3	Date Received:	03/24/18
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8260B		
Project:	Intermediate GWS- SCE&G Calhoun Park Area Site		

Run #	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	11030735.D	1	03/27/18 22:23	NN	n/a	n/a	VII1415
Run #2							

Run #	Purge Volume
Run #1	5.0 ml
Run #2	

Purgeable Aromatics

CAS No.	Compound	Result	RL	MDL	Units	Q
71-43-2	Benzene	3.6	5.0	0.21	ug/l	J
108-88-3	Toluene	0.29 U	5.0	0.29	ug/l	
100-41-4	Ethylbenzene	0.37 U	5.0	0.37	ug/l	
1330-20-7	Xylene (total)	0.67	5.0	0.39	ug/l	J

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
17060-07-0	1,2-Dichloroethane-D4	106%		84-124%
2037-26-5	Toluene-D8	98%		83-115%
460-00-4	4-Bromofluorobenzene	97%		89-111%

U = Not detected MDL = Method Detection Limit

RL = Reporting Limit

E = Indicates value exceeds calibration range

J = Indicates an estimated value

B = Indicates analyte found in associated method blank

N = Indicates presumptive evidence of a compound

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Client Sample ID:	MM-14C	Date Sampled:	03/21/18
Lab Sample ID:	LA42536-3	Date Received:	03/24/18
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8270D SW846 3510C		
Project:	Intermediate GWS- SCE&G Calhoun Park Area Site		

	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	F0037900.D	1	03/28/18 21:07	IK	03/27/18 16:09	OP10873	EF1316
Run #2							

	Initial Volume	Final Volume
Run #1	980 ml	1.0 ml
Run #2		

ABN Special List

CAS No.	Compound	Result	RL	MDL	Units	Q
105-67-9	2,4-Dimethylphenol	0.83 U	10	0.83	ug/l	
50-32-8	Benzo(a)pyrene	0.056 U	10	0.056	ug/l	
86-74-8	Carbazole	0.11 U	10	0.11	ug/l	
91-20-3	Naphthalene	0.26	10	0.072	ug/l	J

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
367-12-4	2-Fluorophenol	56%		23-85%
4165-62-2	Phenol-d5	40%		10-69%
118-79-6	2,4,6-Tribromophenol	106%		48-138%
4165-60-0	Nitrobenzene-d5	99%		51-128%
321-60-8	2-Fluorobiphenyl	81%		55-122%
1718-51-0	Terphenyl-d14	96%		43-138%

U = Not detected MDL = Method Detection Limit

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J = Indicates an estimated value

B = Indicates analyte found in associated method blank

N = Indicates presumptive evidence of a compound

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Client Sample ID:	MM-14C	Date Sampled:	12/12/18
Lab Sample ID:	LA50650-9	Date Received:	12/14/18
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8260B		
Project:	Intermediate GWS- SCE&G Calhoun Park Area Site		

	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	2G094888.D	1	12/20/18 11:00	LS	n/a	n/a	V2G5142
Run #2							

	Purge Volume
Run #1	5.0 ml
Run #2	

Purgeable Aromatics

CAS No.	Compound	Result	RL	MDL	Units	Q
71-43-2	Benzene	3.3	5.0	0.23	ug/l	J
108-88-3	Toluene	0.23 U	5.0	0.23	ug/l	
100-41-4	Ethylbenzene	0.30	5.0	0.23	ug/l	J
1330-20-7	Xylene (total)	0.76	5.0	0.39	ug/l	J

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
17060-07-0	1,2-Dichloroethane-D4	110%		84-124%
2037-26-5	Toluene-D8	100%		83-115%
460-00-4	4-Bromofluorobenzene	96%		89-111%

U = Not detected MDL = Method Detection Limit
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J = Indicates an estimated value
 B = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

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Client Sample ID:	MM-14C	Date Sampled:	12/12/18
Lab Sample ID:	LA50650-9	Date Received:	12/14/18
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8270D SW846 3510C		
Project:	Intermediate GWS- SCE&G Calhoun Park Area Site		

	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	F0046284.D	1	12/20/18 12:45	SV	12/18/18 10:55	OP13076	EF1703
Run #2							

	Initial Volume	Final Volume
Run #1	1030 ml	1.0 ml
Run #2		

ABN Special List

CAS No.	Compound	Result	RL	MDL	Units	Q
105-67-9	2,4-Dimethylphenol	0.060 U	9.7	0.060	ug/l	
50-32-8	Benzo(a)pyrene	0.083 U	9.7	0.083	ug/l	
86-74-8	Carbazole	0.053 U	9.7	0.053	ug/l	
91-20-3	Naphthalene	0.32	9.7	0.075	ug/l	J

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
367-12-4	2-Fluorophenol	63%		19-84%
4165-62-2	Phenol-d5	44%		10-70%
118-79-6	2,4,6-Tribromophenol	125%		46-145%
4165-60-0	Nitrobenzene-d5	110%		36-143%
321-60-8	2-Fluorobiphenyl	97%		48-116%
1718-51-0	Terphenyl-d14	119%		45-133%

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RL = Reporting Limit

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J = Indicates an estimated value

B = Indicates analyte found in associated method blank

N = Indicates presumptive evidence of a compound